

purpose they were authorized to purchase and hold land in fee simple or otherwise, not exceeding three hundred acres at a time, and to erect thereon, all necessary buildings, with a capital of one hundred and fifty thousand dollars, divided into fifteen hundred shares, of one hundred dollars each.

That the company organized soon after the date of the charter, and went into operation ; the complainant at or about that time, becoming their agent at its manufacturing establishment, on the little Patuxent River, in Anne Arundel County—that this agency was continued from that time, until the 6th of July, 1839, when he tendered his resignation, which was accepted, and his brother, Cumberland D. Williams, was appointed in his stead.

The bill alleges, that in June, 1839, the complainant became afflicted with sickness, which entirely disqualified him from attending to business of any kind, and that he remained in this condition until the fall of 1844, when he was restored to health in mind and body—that of the capital stock of the company, which amounted to \$108,100, the sum of \$37,632 32 stood on its books in the name of the complainant, and that his property, including this stock, at the commencement of his sickness, was probably worth over and above all his just debts, about \$35,000—that in this condition of his mental and bodily health, his brothers, George Williams, Cumberland D. Williams, and Nathaniel D. Williams, addressed his, the complainant's son-in-law, a letter upon the subject of making a will, to prevent his property from passing out of his family, but being disappointed in their views in this respect, by his refusal or neglect to comply with their suggestions, they, the brothers, determined to destroy that which they could not obtain, and reduced the complainant to poverty, by the means and instrumentalities which the bill then proceeds to point out—these consisted, as set forth in the bill, in instigating his creditors to sue him, and in a suit which the Savage Manufacturing Company instituted against him for an alleged indebtedness ; the company at that time being altogether controlled by his brother, George and Nathaniel—that in consequence of these proceedings, thus instigated by